

Murray E. Singer  
Attorney at Law

14 Vandeventer Avenue  
Suite 147  
Port Washington, New York 11050  
email: msingerlaw@gmail.com

tel: (516) 869-4207  
fax: (516) 706-7085  
mobile: (516) 662-4950

**BY ECF**

September 30, 2022

Hon. Pamela Chen  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: USA v. Mustafa Goklu  
19-CR-386

Your Honor:

Emilee Sahli and I represent Mustafa Goklu in the above-referenced matter. We are writing to register one objection to the government's proposed limiting instruction (filed as Doc 68 on the docket).

The government proposes the following: "However, to the extent that any of the defendant's communications with other individuals relate to a concern of being detected by law enforcement or an intent to conceal or disguise the nature, location, source, ownership, or control of the property being discussed, you may properly consider such communications with respect to both Count One, charging the defendant with the crime of money laundering, as well as Count Two."

We object to the language "or an intent to conceal or disguise the nature, location, source, ownership, or control of the property being discussed". The evidence the government seeks to introduce, which was discussed at the pretrial conference, relates only to Mr. Goklu's concern about being seen by law enforcement. The Court ruled that this evidence would be relevant to Mr. Goklu's mens rea, so would be admissible as to both counts. However, there were no comments by Mr. Goklu about concealing or disguising the nature, location, source, ownership or control of the property. The government would be free to ask the jury to draw an inference in that regard, but we contend that it should not be part of the Court's instruction on the evidence.

Thank you for your consideration.

Very truly yours,

/s/

cc: all parties by ECF and email

Murray Singer